



Introduction

1. There are 47 local Wildlife Trusts across the whole of the UK, the Isle of Man and Alderney. We are working for an environment rich in wildlife for everyone. With 720,000 members, we are the largest UK voluntary organisation dedicated to conserving the full range of the UK's habitats and species, whether they be in the countryside, in cities or at sea. 134,000 of our members belong to our junior branch, Wildlife Watch. We manage 2,200 nature reserves covering more than 80,000 hectares; we stand up for wildlife; we inspire people about the natural world and we foster sustainable living.
2. This document summarises The Wildlife Trusts' full response.
3. Devon Wildlife Trust (DWT) has been actively involved in protecting the marine environment of Lyme Bay for over 16 years. In that time DWT has worked closely with the fishing industry and regulators to protect the Lyme Bay Reefs and the rich biodiversity they support, and to increase the sustainability of local fisheries. DWT has carried out studies on a wide range of issues and has produced over a dozen reports on:
 - The biodiversity value of the Lyme Bay Reefs
 - The impacts of scallop dredging on this biodiversity
 - Socio-economic issues in Lyme Bay
4. In doing so DWT – and The Wildlife Trusts partnership – have built up an unparalleled understanding of the Lyme Bay Reefs and the issues that surround their future well-being.

The Wildlife Trusts response - summary

General points

5. The Wildlife Trusts welcome the publication of the *Consultation on measures to protect biodiversity in Lyme Bay*. The reef systems of Lyme Bay are of international importance for biodiversity and are the focus of a wide range of human activities. This public consultation will allow the social, economic and environmental value of the reefs to be examined in more detail than in previous discussions, and the needs of a wider range of stakeholders taken into account.
6. Our response is based on the different options for the future management of Lyme Bay Reefs (see box overleaf) that are presented in the *Partial Regulatory Impact Assessment* (hereafter referred to as the RIA) that was circulated with the consultation.



The options in the paper are as follows (with our comments beneath) :

A. *Continue to rely on the areas of protection agreed last year* in which towed gear is excluded. This would either be through the existing voluntary agreement amongst members of South West Inshore Scallopers' Association not to fish in the designated areas or by the introduction of a byelaw or Order banning the use of towed gear in these closed areas.*

B. *Exclude the use of all towed gear, by either SFC Byelaw or Order, in the closed area proposed by English Nature in August 2006**. This would protect an area of 25 square miles of reef habitat in three discrete blocks, essentially bringing the current closed areas closer to the coast.*

C. *Exclude the use of all towed gear, by either SFC Byelaw or Order, in the 60 square mile area originally proposed by English Nature in May 2006.*

* Covering 13 square miles.

** English Nature never changed their position nor their advice that closure of 60 square miles was needed. When it was clear that DEFRA was not even considering this as an option, they wrote to the Fisheries Minister: "Without prejudice to our original statutory advice to close 60 square miles, if you are still minded not to heed our recommendations, I attach a revised submission that would protect 25 square miles of reef habitat in three blocks."

7. A critical question arising from the RIA is whether the consultation is aimed at protecting marine biodiversity in the whole of Lyme Bay (as the title of the consultation suggests), or just the Lyme Bay Reefs (which comprise less than 10% of the Bay). While the options presented, and the discussions around them, focus mainly on the Lyme Bay Reefs, some of the statistics appear to refer to the whole Bay (for example 'the value of scallops caught from Lyme Bay'). This leads to confusion when considering options for the Lyme Bay Reefs. Our comments in this response are limited to the Lyme Bay Reefs.

Our response

8. **It is the view of The Wildlife Trusts that, of the three options, the only credible choice for the protection of Lyme Bay Reefs is Option C.** Only this option will prevent further damage to seabed habitats and protect the rich biodiversity they support, the environmental services they provide and the future of the valuable and sustainable economic activities that depend upon them.

9. We base this conclusion on the work that DWT has carried out on the Lyme Bay Reefs over the past 16 years. This has shown that:

- Lyme Bay Reefs support rich and varied biological communities of national importance.
- Scallop dredging destroys seabed species and the habitats on which they depend.
- Species can recover, provided that damage to habitat is not too extreme.
- Diving, potting and sea angling are all activities that take place on Lyme Bay Reefs; each relies on healthy reefs for their future.
- All can be carried out without damaging reef habitats.



- The economic value of the sustainable use of Lyme Bay Reefs to local communities is more than double that of scallop dredging.

10. The extent of protection needs to be based on the distribution of reef habitat, not of individual species. It was analysis of habitat information that resulted in the 60 square miles set out in English Nature's original recommendation, not the presence or absence of pink sea fans, or any other species. Drop-down video work carried out over the winter and spring of 2006-7 has confirmed this approach, noting the presence of rich wildlife communities – and, incidentally, significant numbers of pink sea fans – on areas of reef habitat outside the areas covered by the current agreement.

11. A study carried out on behalf of The Wildlife Trusts suggests that the value of the Lyme Bay Reefs to the scalloping industry (approx. £180,000 p.a.) is less than half of the value to other, more sustainable activities including potting, sports diving and sea angling (together worth approx. £509,000 p.a.).

12. The Wildlife Trusts believe that the current agreement, reached between Defra and the scalloping interests in August 2006 – and by extension Option A, based upon this agreement – does not provide adequate protection for the Lyme Bay Reef, the biological communities they support, or the economic activities that rely on healthy reefs for a sustainable future.

13. The Wildlife Trusts believe that Option B, in failing to cover the whole of the reef area as identified in biotope and habitat maps that DWT produced and made public in 2005, similarly fails to provide the protection that the Lyme Bay Reefs require.

14. Unchecked and unregulated, dredging would eventually, at some future point, demolish the Lyme Bay Reefs. Scalloping has taken place over most of the 60 square miles proposed for closure at some point in the past. However, the Lyme Bay Reefs are still capable of recovery because:

- There are still pristine areas which contain the full assemblage of reef organisms to re-colonise damaged areas.
- Most of the reef, even where it has been broken up and degraded, is currently still capable of regeneration up to and including full recovery.

15. This means that there is still much to be gained by closure. Every day that passes with scalloping taking place within the proposed 60 square miles reduces the potential for recovery. At some point in the future this fishery will, if left unchecked, destroy the reefs.

16. Closing the 60 square miles of reefs would have a significant and positive socio-economic impact with enormous conservation gain. It would secure a sustainable economic return (two and a half times larger than income from scalloping) from sea angling, recreational diving, hand collecting of scallops and potting for crabs and lobsters. It would also secure the public good inherent in a rich functioning ecosystem.